

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

No. 2:21-cv-00693-JHC
**STIPULATED MOTION AND ORDER
REGARDING SEALING OF MOTION TO
COMPEL BRIEFING**
NOTE ON MOTION CALENDAR:
August 19, 2024

DEBORAH FRAME-WILSON, *et al.*, on
behalf of themselves and all other similarly
situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

No. 2:20-cv-00424-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

No. 2:22-cv-00965-JHC

1 The Parties have met and conferred with respect to the upcoming briefing on Plaintiffs'
2 Motion to Compel, and anticipate that their briefs, declarations, and exhibits will quote from
3 and/or describe in detail a significant amount of information that has been designated as
4 Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon. Accordingly, in order to
5 ensure that such materials are treated appropriately under the applicable protective order, and to
6 reduce burdens on the Court, the Parties, pursuant to LCR 7(d)(1) and 10(g), and their respective
7 counsel, hereby stipulate and agree to the following procedure for filing and sealing in
8 connection with the motion to compel briefing, subject to the Court's approval.

9 1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its briefs
10 (including any opening, response, and reply briefs), declarations, exhibits, and all other evidence
11 and declarations on which that Party relies (collectively, "Motion to Compel Papers") which
12 contain material designated Confidential or Highly Confidential-Attorneys' Eyes Only by
13 Amazon.

14 2. Within two weeks of the filing of Plaintiffs' reply brief, pursuant to LCR 5(g), the
15 Parties will meet and confer and, as appropriate, file (1) public versions of their Motion to
16 Compel Papers, with necessary redactions, and (2) corresponding motion(s) to seal pursuant to
17 LCR 5(g)(3). The Party seeking to maintain material under seal (or under redaction) shall be the
18 movant for purposes of any such motion(s) to seal associated with the Parties' Motion to Compel
19 Papers.

20 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.
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1 DATED August 19, 2024.

Respectfully submitted,

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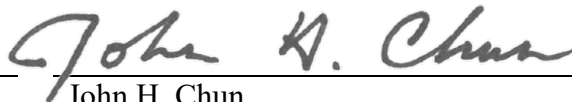
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1 IT IS SO ORDERED.

2
3 August 19, 2024



4 Dated

John H. Chun

United States District Judge